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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

REGINA CASTRO,

Plaintiff,

vs.

COUNTY OF LOS ANGELES, CHAD
MELTON, and DOES 1-10, inclusive,

Defendants.

Case No.: 2:23-cv-02810-WLH-MARx

**RESPONSE TO OSC AND
STIPULATION TO CONTINUE
OSC RE DISMISSAL**

OSC re Dismissal:
Date: April 25, 2025
Time: 1:00 p.m.

Proposed Cont. OSC re Dismissal:
Date: August 22, 2025
Time: 1:00 p.m.

1 IT IS HEREBY STIPULATED by and between Plaintiff, REGINA CASTRO
2 and Defendants, COUNTY OF LOS ANGELES, and CHAD MELTON, by and
3 through their counsel of record, to continue the OSC re Dismissal currently
4 scheduled for April 25, 2025 (Dkt. 51), subject to approval by the Court. The
5 parties submit that, as outlined below, GOOD CAUSE exists for this continuance.

6 1. The Parties participated in a mediation on December 15, 2023, with
7 mediator Judge Joseph Biderman (Ret.).

8 2. On December 27, 2023, the Parties filed their Joint Status Report
9 Regarding Conditional Settlement of Entire Action and Request to Continue and/or
10 Vacate all Dates. (Dkt. 44).

11 3. On December 27, 2023, the Court set an Order to Show Cause re
12 Dismissal for March 22, 2024 and vacated all dates and deadlines. (Dkt. 45).

13 4. On February 27, 2024, Plaintiff and her counsel signed the Release in
14 Full Settlement and Compromise Agreement.

15 5. On March 6, 2024, the Parties filed their Response to OSC and
16 Stipulation to Continue OSC re Dismissal, whereby the County estimated that the
17 approval process will take approximately nine (9) months. (Dkt. 46).

18 6. On March 18, 2024, the Court continued the OSC re Dismissal to
19 January 17, 2025. (Dkt. 48).

20 7. On January 13, 2025, following stipulation of the parties, the Court
21 again continued the OSC re Dismissal to April 25, 2025. (Dkt. 51).

22 8. The settlement is subject to the County's approval process, which
23 entails final approval by the Contract Cities Claims Board and the County of Los
24 Angeles Board of Supervisors. The approval process is underway, but it is expected
25 to take another several months to complete.

26 9. Once the LASD completes its internal review of a matter, it forwards
27 its required documentation to the LASD Risk Management Bureau and the CEO of
28 Risk Management for Los Angeles County for review. Upon the concurrence of the

1 CEO of Risk Management for Los Angeles County, the documentation is processed
2 through the LASD chain of command. Once the final signature process for LASD is
3 complete, the documentation is provided to the CEO of Risk Management for Los
4 Angeles County for final review and signature, at which time the matter can be
5 placed on the Contract Cities Claims Board agenda. After approval by the Contract
6 Cities Claims Board, the matter will then be placed on the Public Safety Cluster
7 Review agenda, which is typically within 30 days. After the Cluster Agenda has
8 been advised of the settlement, the matter will go before the County Board of
9 Supervisors for approval, which is typically within 30 days.

10 10. Based on defense counsel's understanding and belief, the Los Angeles
11 County Sheriff's Department Risk Management Bureau has been restructured,
12 which created a further backlog of matters awaiting settlement approval. Along
13 with the restructuring was the implementation of a new format and structure for
14 documentation required for a matter to proceed to the Contract Cities Claims Board
15 for settlement approval.

16 11. The Contract Cities Claims Board meets once a month, typically on the
17 second Wednesday of the month. When the parties filed the prior stipulation (Dkt.
18 50), it was expected that this matter would be on the Contract Cities Claims Board
19 Agenda in or around April 2025. However, because of the backlog, the matter still
20 has not been placed on the Contract Cities Claims Board agenda. It is expected to
21 be on the July 9, 2025, agenda. If the Settlement is approved by the Contract Cities
22 Claims Board, it is expected that it will be on the Board of Supervisors Agenda
23 within 45 days and, if approved by the Board of Supervisors, that Plaintiff will
24 receive the settlement funds within 45 days of the final approval.

25 12. If the Settlement is approved, the Parties will file a stipulation to
26 dismiss the entire action with prejudice within ten days of Plaintiff's receipt of the
27 settlement funds.

28 13. Therefore, the Parties respectfully request the Court continue the OSC

1 re Dismissal from April 25, 2025, to August 22, 2025, and further respectfully
2 request the Court to maintain jurisdiction over the case pending the approval of the
3 settlement.

4 IT IS SO STIPULATED.

5
6 DATED: April 23, 2025

LAW OFFICES OF DALE K. GALIPO

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8 By: /s/ Marcel Sincich

Dale K. Galipo, Esq.

9 Marcel F. Sincich, Esq.

10 *Attorneys for Plaintiff* REGINA CASTRO

11 DATED: April 23, 2025

CARPENTER, ROTHANS & DUMONT

12
13 /s/ Jill Williams

14 By: _____

Jill Williams

15 Scott J. Carpenter

16 *Attorneys for Defendant* COUNTY OF LOS
ANGELES

17
18 DATED: April 23, 2025

SEKI, NISHIMURA & WATASE, PLC

19
20 By: /s/ Janet Keuper

21 Janet L. Keuper

22 *Attorneys for Defendant* CHAD MELTON
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